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**BY ECF**

March 16, 2012

The Honorable Kiyo A. Matsumoto  
United States District Judge  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**RE:           United States v. Russo, et al.  
              Indictment No. 11-CR-30 (KAM)  
              Defendant Michael Castellano**

Dear Judge Matsumoto:

I represent defendant Michael Castellano (hereinafter "defendant") in the above-entitled criminal action. Defendant's sentencing is currently scheduled for April 30, 2012 at 5:00 p.m.

I am writing this letter to respectfully request, with the consent of the Government, a change of defendant's sentencing date. I will be out of the country from April 28, 2012 until May 12, 2012, which coincides with the sentencing date set by the Court. I have discussed this request with AUSA Allon Lifshitz, the assistant handling the case, and he consents to our request. The parties have discussed their availability, and propose a sentencing date in the week preceding the currently scheduled sentencing date, or a date after May 12, 2012 that is convenient for the Court.


This is our third request for an adjournment. We had made a previous request on December 29, 2011, since we were awaiting a report from an expert concerning a serious health issue confronting defendant's 5-year-old son that the Court granted. We made a second request on February 27, 2012, due to an issue with the Pre-sentence report that the Court also granted. These issues have both been resolved, and we are prepared to submit our sentencing memorandum shortly.

Hon. Kiyo A. Matsumoto  
March 16, 2012  
Page 2

Accordingly, I respectfully request that defendant's sentencing be changed to a date in the week preceding the currently scheduled sentencing date of April 30, 2012, or a date that is convenient for the Court after May 12, 2012.

Thank you.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven R. Kartagener". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steven R. Kartagener

cc: AUSA Allon Lifshitz (via ECF)